

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

WAYNE BALIGA,

Plaintiff,

- against -

LINK MOTION INC. (F/K/A NQ MOBILE INC.),
VINCENT WENYOUNG SHI, JIA LIAN, XIAO
YU,

Defendants.

No. 1:18-cv-11642-VM-DCF

DECLARATION OF KRISTIE M. BLASE

KRISTIE M. BLASE declares, pursuant to 28 U.S.C. § 1746, as follows:

1. I am an attorney duly admitted to practice law before the United States District Court for the Southern District of New York. I am an attorney at the law firm Felicello Law P.C. and counsel of record for Defendant Vincent Wenyong Shi (“Dr. Shi”).

2. The bases for this declaration are unsolicited emails that I received at my firm email address: kristie@felicellolaw.com.

3. I submit this declaration in redacted form in order to protect the identities of the author of the foregoing emails. An unredacted version of this declaration will be made available to the Court *in camera* upon request.

4. On June ■, 2022 at ■■■■■, I received an email from ■■■■■
■■■■■ (“Author No. 1”), who reports that he/she served as a
■■■■■ for the Receivership at the request of Mr. Lilin “Francis” Guo as agent for the Receiver on behalf of the Company. Author No. 1 complains that Mr. Guo has

refused to pay Author No. 1 for past-rendered services in connection with the Receivership. Author No. 1 also claims to have discovered that Mr. Guo is continuing to pay the employees of his own, separate business but refuses to pay professionals he retained for the Receivership.

5. On June ■, 2022 at ■■■■■, I received another email, also from Author No. 1, continuing to complain that Mr. Guo has recently paid his own company's employees but not vendors of the Receivership. Author No. 1 claims to have information showing that Mr. Guo also previously paid legal fees for Plaintiff's counsel and counsel for the Receiver in this action.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: June 30, 2022



Kristie M. Blase